

COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES



Post Office Box 2063 Harrisburg, Pennsylvania 17120 June 28, 1983

(717) 787-7381

William L. Walsh Waste Enforcement Section (3AW22) EPA, Region III Sixth and Walnut Streets Philadelphia, PA 19106

Dear Bill:

Enclosed is the latest list of Part B withdrawal request confirmations. With the exception of three facilities whose status has not been resolved (Textron, Crucible, and Rodwin), I believe I have addressed all of those which were marked with an asterisk. Note that some of the facilities do require the submission of a Part B.

In going over the files, I noticed that occasionally we do not have copies of letters you refer to, that is, those letters which were sent directly to EPA. Would you check with whoever takes care of this to be sure that it is done in the future. Although DER requires its own originally signed Notification Forms to request changes in status it helps me to see where you are coming from.

If you have any questions, give me a call.

Sincerely,

GAYLE LEADER, Sanitary Engineer Division of Hazardous Waste Management

REGION I - NORRISTOWN

Borden Company - Krylon Department--Norristown--PAD001865906--This facility is still considered a TSD.

E. I. DuPont-Philadelphia -- PAD002311884 -- Facility is closed, generator only.

Inolex Chemical Company -- Philadelphia -- PAD042261735 -- Not a TSD.

Western Electric Company -- Allentown -- PAD002389252 -- Not a storage facility.

Metal Bank of America--Philadelphia--PAD046557096--Company is a generator only, waste is shipped offsite for recycle.

National Can Corporation--Morrisville--PAD046565941--Still a TSD, Part B is required.

American Olean Tile Company--Lansdale--PAD002347003--Lagoons have been closed (they are still installing monitoring wells), other activities are covered by Permit-by-Rule.

Avery International Corporation--Fasson Division--Quakertown--PAD053277752 --Deleted storage status.

Lukens Steel Company--Coatesville--PAD002326908--DER called for a Part B from Lukens, we did not see the 4/13/83 letter you refer to.

SmithKline Chemicals--Swedeland--PAD980551964--Not a TSD.

U.S. Steel Corporation--Fairless Hills--PAD002375376--No Part B needed, EPA was copied on a letter of 4/21/83 from DER to U.S. Steel.

REGION II--WILKES-BARRE

Metroplitan Wire Corporation--Wilkes-Barre--PAD003032752--Not totally enclosed treatment, may be Permit-by-Rule, no storage over 90 days.

REGION III--HARRISBURG

Owens Corning Fiberglass Corporation--Huntingdon--PAD000819458--At last inspection, Owens had drums onsite for longer than 90 days, they were asked to submit an explanation on this but have not done so to date.

Small Tube Products--Altoona--PAD051136091--Closure has been certified as of 5/83, now has less than 90-day storage.

Bethlehem Steel Corporation--Lebanon--PAD003025277--Were granted Permit-by-Rule, no Part B needed.

Chicago Rivet and Machine Company--Tyrone--PAD004321633--No storage permit needed.

Hamilton Precision Metals--Lancaster--PAD000800698--Deleted storage status.

FF-3386 REV. 7-82

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cc: R. W. Laurre - Marshall Lab Shirley Bulkin - Region III

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E. I. DU PONT DE NEMOURS & COMPANY WILMINGTON, DELAWARE 19898

FINISHES & FABRICATED PRODUCTS DEPARTMENT

December 17, 1982

Mr. Stephen R. Wassersug, Director Air and Waste Management Division Region III Environment Protection Agency 6th and Walnut Street Philadelphia, PA 19106

Dear Mr. Wassersug:

We received your letter to Mr. W. A. Bours, III, concerning our Philadelphia, PA site (EPA ID No. PAD 002311884) requesting our Part B RCRA permit for a Hazardous Waste Management (HWM) facility. This location is now only a research and development site which generates RCRA hazardous waste and has Interim Status as a storage (only) facility as a result of timely submission of both Notification under Section 3010 and a Part A application. At the time of these submissions, the site also included a paint manufacturing plant which was shut down early this year.

In the time since RCRA regulations become effective, we have decided not to apply for a permanent storage permit under RCRA and Pennsylvania environmental regulations. Under separate cover, a notice of intent to close and a copy of our Closure Plan is being sent to the Norristown regional office of Pennsylvania DER with copy to the Region III Administrator (per 40 CFR 265.112).

Upon approval of this rather simple closure plan—it involves only containers and two tanks of hazardous waste—we will send the remaining waste to an RCRA HWM facility and certify closure according to 40 CFR 265.115. This site would then revert to a regular generator only status subject to 40 CFR Part 262 and the Pennsylvania regulations (25 PA Code Chapter 75).

Please address any questions to me at (302) 774-3891 or this address:

R. A. Mead

E. I. du Pont de Nemours & Company Finishes and Fabricated Products Department, B-2303 1007 Market Street

Wilmington, DE 19898

Sincerely, Auusla R. A. Mead

Environmental Protection Coordinator

RAM/dmp

E. I. DU PONT DE NEMOURS & COMPANY

WILMINGTON, DELAWARE 19898

cc: R. W. Laurrel - Marshall Lab Shirley Bulk - Region III *

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FINISHES & FABRICATED PRODUCTS DEPARTMENT

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Please address any questions to me at (302) 774-3891 or this address:

> R. A. Mead E. I. du Pont de Nemours & Company Finishes and Fabricated Products Department, B-2303 1007 Market Street Wilmington, DE 19898

Environmental Protection Coordinator

RAM/dmp



E. I. DU PONT DE NEMOURS & COMPANY

WILMINGTON, DELAWARE 19898

FINISHES & FABRICATED PRODUCTS DEPARTMENT

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DEC 2 0 1982

EPA, R3

December 17, 1982

Mr. Wayne L. Lynn, Manager Regional Solid Waste Facility Pennsylvania Department of Environmental Resources 1875 New Hope Street Norristown, PA 19401

Dear Mr. Lynn:

We received your letter to Mr. W. A. Bours, III, concerning our Philadelphia site (EPA ID No. PAD 002311884) requesting our Part B RCRA permit for a Hazardous Waste Management (HWM) facility. This location is now a research and development facility which generates RCRA hazardous waste and has Interim Status as a storage (only) facility as a result of timely submission of both Notification under Section 3010 and a Part A application. At the time of these submissions, a paint manufacturing plant operated on the site (this was shut down earlier this year).

In the time since RCRA regulations became effective, we have decided not to apply for a permanent storage permit under RCRA and Pennsylvania environmental regulations. Under separate cover, a notice of intent to close and a copy of our Closure Plan is being sent to Larry Lunsk of your office (per 40 CFR 265.112 and 25 PA Code 75.2650 (o) (5).

Upon approval of this rather simple closure plan—it involves only containers and two tanks of hazardous waste—we will send the remaining waste to an RCRA HWM facility and certify closure according to 40 CFR 265.115 and 25 PA 75.265 (o) (9). This site would then revert to a regular generator status subject to 40 CFR Part 262 and 25 PA Code Chapter 75 regulations.

Please address any questions to me at (302) 774-3891 or this address:

R. A. Mead
E. I. du Pont de Nemours & Company
Finishes & Fabricated Products Department
B-2303
1007 Market Street
Wilmington, DE 19898

Sincerely,

R. A. Mead

Environmental Protection Coordinator

RAM/dmp



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL RESOURCES 1875 New Hope Street

1875 New Hope Street Norristown, PA 19401 215 631-2420



October 12, 1982

Mr. W. A. Bours III Vice President Fabrics and Fin. E. I. DuPont De Nemours and Company, Inc. 1007 Market Street Wilmington, DE 19898

Re: EPA Identification No. PAD 00 231 1884

Facility Name:

E. I. DuPont

3500 Grays Ferry Avenue Philadelphia, PA 19146

Dear Mr. Bours:

This letter constitutes a formal request for Part B of your application for Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 PA Code Chapter 75, Subchapter D, for the facility referenced above. This request is made under the authority of Section 75.265(z)(6) of the regulations. You should refer to the hazardous waste management regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you for the requirements of the Part B application. Your Part B application must be submitted no later than six months from the date of this notice. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

Enclosed are reference checklists for your Part B application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Previously, you have received a letter from the U. S. Environmental Protection Agency requesting this submission. Your Part B application will be reviewed for a hazardous waste management TSD Permit by each agency until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

You should submit the Part B application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

When completed, please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact us.

Very truly yours,

WAYNE L. LYNN Regional Solid Waste Manager

Re P770

ENCLOSURE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

AUG 23 1982

6TH AND WALNUT STREETS
PHILADELPHIA, PENNSYLVANIA 19106

Certified Mail
Return Receipt Requested

Mr. W. A. Bours III, Vice Pres. Fabrics & Fin. E. I. DuPont De Nemours & Co. Inc. 1007 Market St. Wilmington, DE 19898

Re: EPA Identification No. PAD 00 231 1884

Facility Name:

E. I. DuPont

3500 Grays Ferry Ave. Philadelphia, PA 19146

Dear Mr. Bours:

This letter constitutes a formal request for Part B of your application for a hazardous waste management facility permit under the Resource Conservation and Recovery Act (RCRA) for the facility referenced above. This request is made under the authority of regulation 40 CFR § 122.22(a).

Enclosed for your reference is a list of the items which constitute Part B as applicable to your facility type. These items must be submitted by February 18, 1983. If any of this information is being submitted under a claim of confidentiality, please indicate this fact. (For more information on confidentiality see regulation 40 CFR Part 2.)

Should you have any questions about these requirements, please contact Ms. Shirley Bulkin on 215/597-4269 or the address shown above.

You should be aware that the Commonwealth of Pennsylvania is applying to EPA for Phase II interim authorization to administer the State hazardous waste facility permitting program in lieu of the Federal program. Until such a time as Pennsylvania actually receives authorization, both Federal and State programs will coexist.

You will receive a request for a State permit application from the Commonwealth of Pennsylvania. The State regulations may differ from the Federal regulations. We encourage the applicant to become aware of State permit application requirements. For further information concerning the State requirements, the applicant should contact Mr. Gary Galida of the Department of Environmental Resources, Bureau of Solid Waste Management in Harrisburg at 717/787-7381.

Sincerely yours,

Stephen R. Wassersug

Director, Air & Waste Management Division

Enclosure: List of Part B Requirements

Part 264 Standards